

May 18, 2011

Filed Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Notice of Ex parte regarding: WC Docket Nos. 10-90, 07-135, 05-337 and 03-109, GN Docket No. 09-51 and CC Docket Nos. 01-92 and 96-45 in the matter of Connect America Fund, a National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-cost Universal Support, developing a Unified Intercarrier Compensation Regime, federal-State Joint Board on Universal Service, Lifeline and Link-up

Dear Ms Dortch:

On May 17, 2011, Dave Beier of Fidelity Telephone Company and Steve Pastokorvich of The Organization for the Promotion and Advancement of Small Telecommunication Companies (OPASTCO) met with the following members of the Federal Communications Commission's Wireline Competition Bureau, Kevin King, Rohit Dixit, Patrick Halley, Albert Lewis, John Hunter and Carol Matthey to discuss the FCC's pending universal service and inter-carrier compensation notice of proposed rulemaking in the referenced dockets. Andy Denzer of Warinner, Gesinger and Associates, LLC participated via conference call. The discussion was both in general and how the proposed changes impact Fidelity specifically.

Fidelity previously filed comments on April 18, 2011 in the mentioned dockets and on July 12, 2010 in the additional WC Docket Nos. 10-90 and 05-337, and GN Docket 09-51.

Dave Beier presented the company statics; financial information related to regulated and non-regulated operations; the analysis of the impact of the FCC's proposed USF and inter-carrier compensation reform as presented in comments filed on April 18, 2011, including the supporting documentation, and; the impact of bringing Missouri's approved intrastate access charges into parity with interstate access charges.

On behalf of Fidelity Telephone Company and pursuant to Section 1.1206(b) of the Commission's rules, a redacted version of this submission is filed for inclusion in the public record of the referenced proceeding.

Sincerely,



Andrew A. Denzer, Principal

WARINNER, GESINGER & ASSOCIATES, LLC

cc: Dave Beier, Fidelity Telephone Company

Midwest

10561 Barkley Street, Suite 550
Overland Park, Kansas 66212-1835

p 913 599-3236
f 913 599-3737

www.wgaacpa.com

Northwest

501 SW 295th Place
Federal Way, WA 98023-3531

253 941-5668 p
253 529-9004 f

CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN CC
DOCKET NO. 01-92, WC DOCKETS NOS. 05-337, 07-135 AND 10-90 AND
GN DOCKET NO 09-51 BEFORE THE FCC

Fidelity Telephone Company
Ex Parte Presentation to
FCC WCB Staff
Washington, D.C.
May 17, 2011



AGENDA

- I. INTRODUCTIONS
- II. PURPOSE OF VISIT
- III. FIDELITY DATA
- IV. FIDELITY COMMENTS TO FCC PROPOSALS
- V. HIGH MISSOURI INTRASTATE ACCESS RATES
- VI. QUESTIONS
- VII. CONCLUSIONS

I. INTRODUCTIONS

Dave Beier, VP – Regulatory
Fidelity Telephone Co.
64 N. Clark
Sullivan, MO 63080
573-468-1218
dave.beier@fidelitycommunications.com

Steve Pastorkovich
OPASTCO Business Development Director/
Senior Policy Analyst
202-659-0715
sfp@opastco.org

Andy Denzer, Principal
Warinner, Gesinger & Associates (WGA)
Cost Consultant for Fidelity
913-599-3236
denzer@wgacpa.com



II. PURPOSE OF VISIT

- A. Address impact of USF and ICC Reform on Fidelity
- B. Provide Company specific data
- C. Show support for Rural Association's Plan for Rate-of-return RLEC's
- D. Highlight FCC Comments filed by Fidelity
- E. Address Missouri intrastate access rates

III. FIDELITY DATA

A. Fidelity Associations/Memberships

OPASTCO, NTCA, NECA, MoSTCG (30 small Missouri telcos)

B. Fidelity Telephone Co—Rate-of-return ILEC

Affiliates: Fidelity Long Distance-LD provider

Fidelity Networks-Internet Service Provider via DSL, cable modem
and dial-up

Fidelity Cablevision-CATV provider

Several CLEC's operating in multiple states

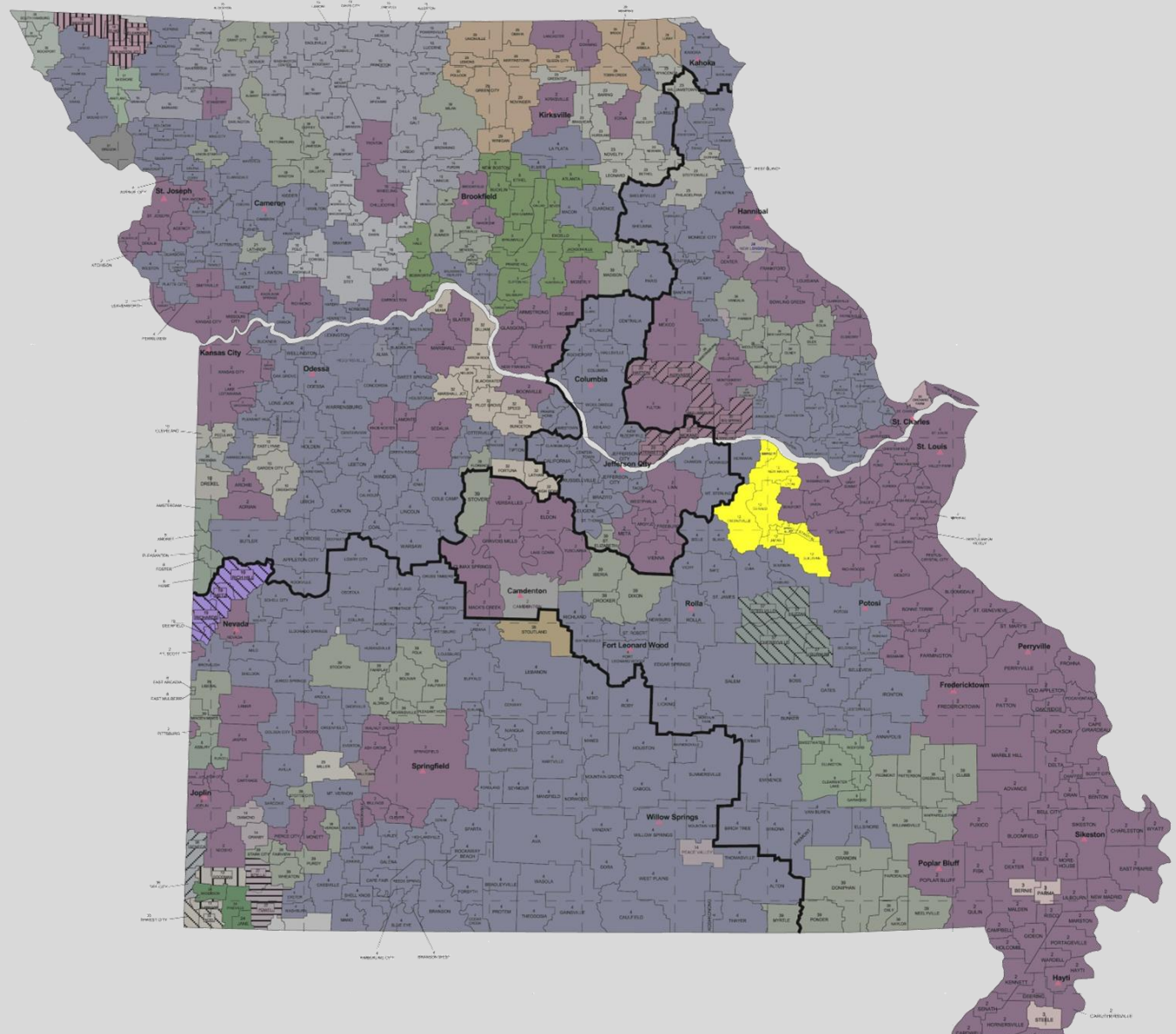
Member of MNA, a Missouri statewide backbone
network facilities and tandem switching provider

Partner with AT&T in Missouri RSA 11/12

All companies are part of a holding company called Fidelity
Communications Co. with headquarters in Sullivan, MO



C. MAP



D. COMPANY STATISTICS

1. The ILEC serves 680 square miles and the network consists of _____ miles of buried fiber and cable
2. The ILEC serves 9 exchanges, including Sullivan, New Haven, Gerald and Owensville, with Sullivan being the largest with a population of approximately 7,000
3. The ILEC currently serves approx. _____ lines (line counts declining like most other ILEC's)
4. The ILEC currently serves approx. _____ DSL customers; roughly a _____% penetration of customers served, which is very good by industry standards
5. Broadband is predominantly DSL within the ILEC area; 100% of customers have access to DSL, while approx 96% have access at speeds of at least 768 kbps; speeds offered up to 10 Mbps, with the lowest speed at 512 kbps, while most customers take 1.5 Mbps
6. Total Plant in Service - \$_____; Net Plant - \$_____ (See detailed schedule in NPRM comments)

D. COMPANY STATISTICS (continued)

7. Total 2010 ILEC Regulated revenues - \$ _____ consisting of:
USF, ICLS, LSS – \$ _____
Local and Misc – \$ _____
Interstate SLC's ,Switched and Special Access – \$ _____
Intrastate Access – \$ _____

(Large portion of revenues not coming from consumers)

Total 2010 Regulated expenses, including depreciation and income taxes -
\$ _____

Fidelity expenses have increased total of 10% over the last 10 years!

Total 2010 Net profit - \$ _____

8. Within ILEC area, 2010 Nonregulated revenues for internet, video and long distance – \$ _____; corresponding Nonregulated expense including income taxes – \$ _____; net profit \$ _____
High costs – CATV programming, wholesale LD, network maintenance

If nonregulated revenues are included in USF (or CAF) calculations, then nonregulated expenses should be also



D. COMPANY STATISTICS (continued)

9. Rates

Residential Local rate = \$____ plus \$6.50 SLC plus other surcharges such as USF, 911, federal excise and local taxes for a total bill of approx \$____; multiline business rate of \$____ plus \$9.20 SLC plus other surcharges such as USF, 911, federal excise and local taxes for a total bill of approx \$____

Broadband rates in a package start at \$____ and go up from there depending upon packages and downstream and upstream speeds

Access rates - 2010 interstate (NECA rates) blended rate of \$.____ per minute and intrastate blended rate of \$.____ per minute (will discuss further in later slide)

E. OTHER

We provide special access circuits (T1's) to __ wireless towers in our ILEC area; coverage in our area is good from AT&T; our services and networks complement one another

Approx 120 employees work for the ILEC; as with all rural companies, Fidelity is very involved in the community that we serve; we take our Carrier of Last Resort obligations very seriously and take pride in offering high level voice and broadband service

IV. FIDELITY COMMENTS TO FCC PROPOSALS

- A. Fidelity Telephone Comments made July 12 , 2010 regarding CAF, National Broadband Plan and USF (data provided from 2009 and forward looking projections)

Summary of comments:

1. The proposed changes to USF may jeopardize the financial viability of Fidelity Telephone Co.
2. Data projections for proposed changes from the Plan showed a shortfall of \$_____ per line month by 2015 and a shortfall of cash flows of almost \$_____per year
3. Even if our local rates are set at comparable rates to urban landline providers or wireless providers, the revenues generated by Fidelity lines will not cover our expenses
4. Fidelity opposes creating a “digital divide”, hypothetical cost models, reverse auctions, and incentive regulation (versus Rate-of-return regulation)



IV. FIDELITY COMMENTS TO FCC PROPOSALS (continued)

B. Fidelity Telephone Comments made April 18, 2011 regarding the FCC's NPRM regarding USF Support and ICC (used data through 2010 as well as forward looking projections)

Summary of comments:

1. Addressed the financial impact of specific proposed rule changes in Appendix A of the NPRM
2. Disagree with the need to limit or eliminate corporate operations expenses includable in USF (or CAF) and ICLS, as these expenses are essential to any business
3. Impact of proposed changes would cause us to need to increase end user rates by \$_____ per line per month to stay revenue neutral; consumers cannot be expected to absorb these increases so the only other alternative is a "revenue recovery mechanism"
4. Changes should be phased-in so as to not jeopardize the recovery of prior investments, which were made under prior business plans and regulatory structures



IV. FIDELITY COMMENTS TO FCC PROPOSALS (continued)

5. FCC should consider alternatives such as raising SLC's to the maximum allowed to pay for the deployment of broadband networks before USF is redirected from the high-cost rural ILEC's (e.g. AT&T's Res & SLB SLC is only \$5.48, rather than standard \$6.50)
6. See attached supporting data from the filing (public version as redacted)

V. HIGH MISSOURI INTRASTATE ACCESS RATES

- Although the Missouri Legislature has authorized the Missouri PSC to create a state high cost fund, to date the Missouri PSC has declined to do so.
- Historically, the Missouri PSC has consciously set intrastate access rates at a relatively high level in order to maintain low local rates (primarily to reflect the limited calling scope of rural subscribers).
- Recent efforts to implement access reform by the Missouri Legislature have met with limited success, primarily because of the Legislature's unwillingness to implement a subscriber charge in order to fund a state high cost fund.
- If all Small Missouri LECs reduce intrastate access rates to their interstate counterparts this would result in an annual decrease in access revenues of approximately \$_____. Replacing that lost revenue (assuming no state fund support) would require Missouri Small LECs to increase their local rates, on average, by over \$____ a month.
- In Fidelity's case, reducing intrastate access rates to interstate levels would result in an annual revenue loss of approximately \$_____ and require an increase in local rates of over \$_____ a month to replace those revenues.
- Reducing access rates to a \$.0007 per minute or "bill and keep" would have even more disastrous impact on the revenues (and the financial viability) of the Missouri Small LECs and Fidelity, costing over \$_____ and requiring an increase in local rates of over \$_____ a month to replace those revenues.

V. HIGH MISSOURI INTRASTATE ACCESS RATES (continued)

Suggested solution:

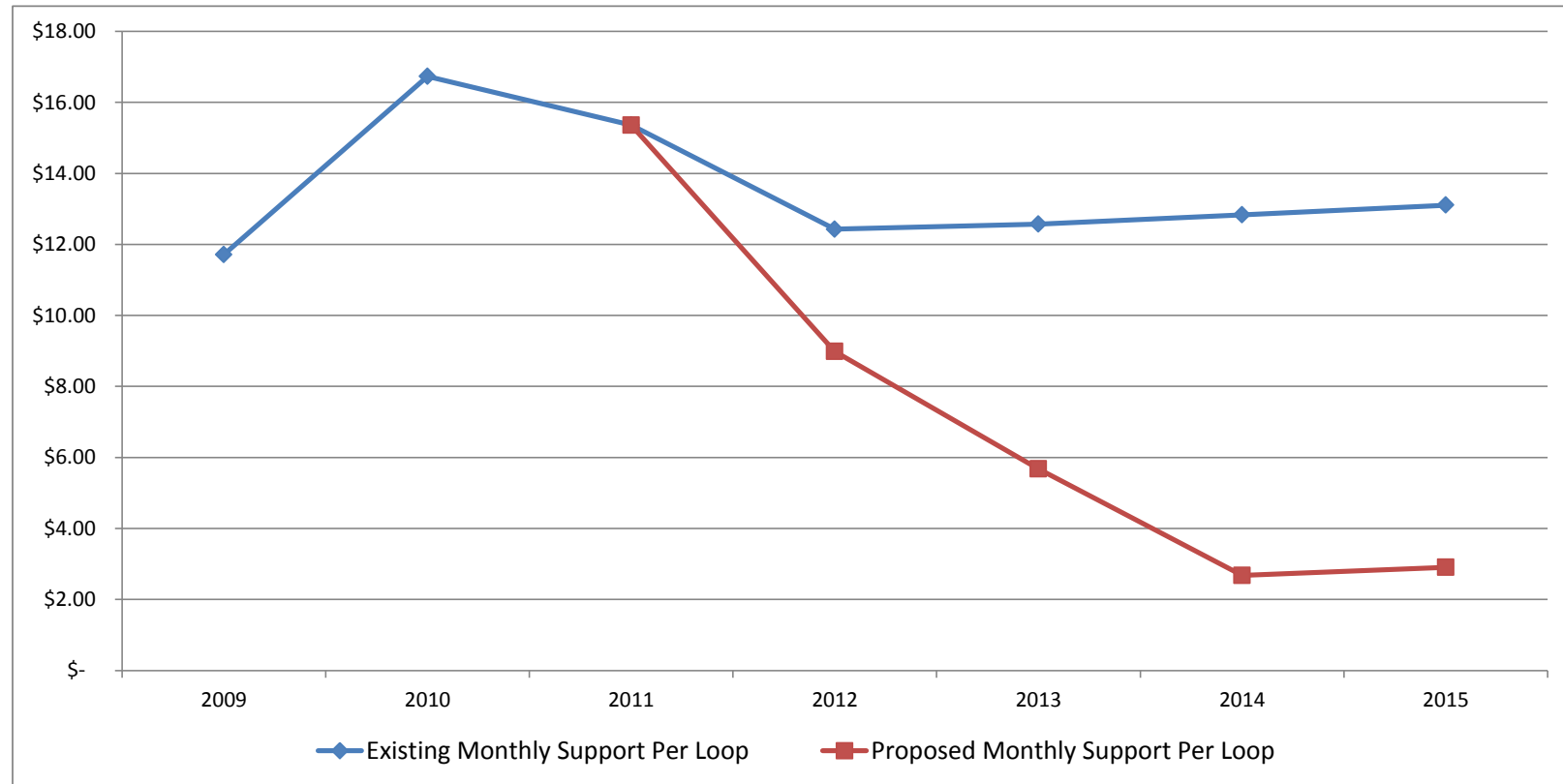
- Phase-in approach
- Keep the states involved
- Develop reformed or unified rates, but keep per minute access charges, as there is a cost to provide the network and those that use more of the service should pay more, just like any other utility
- Replace lost access revenues with a combination of a small phased-in increase to local rates, a state USF fund and a federal “recovery mechanism”
- Access rates should apply to VoIP calls, as these calls have the same cost to our network, just a different technology
- Address “phantom traffic” by requiring full call detail to be maintained in a call record

VI. QUESTIONS

VII. CONCLUSIONS

- Rate-of-return regulation and USF has worked well to bring quality voice and broadband service to rural America; accordingly, Rate-of-return regulation should be maintained for Rural ILEC's
- We support the Rural Association's Plan for Rate-of-return RLEC's
- Fidelity's profits have declined, but we continue to invest profits back into the network
- A new Connect America Fund, as a replacement for USF, must pay for ongoing operations, maintenance and upgrades
- Replace lost access revenues with a combination of a phased-in small increase to local rates, a state USF fund and a federal "recovery mechanism"
- The potential losses of USF and ICC revenues for Fidelity from proposed changes is too large (i.e. \$_____ from USF changes and another \$ ____ from taking intrastate access rates to parity with interstate) to pass on to consumers; accordingly, we must have a "revenue recovery" mechanism; otherwise, jobs will be lost and quality of service will suffer or, in the extreme, we will be out of business

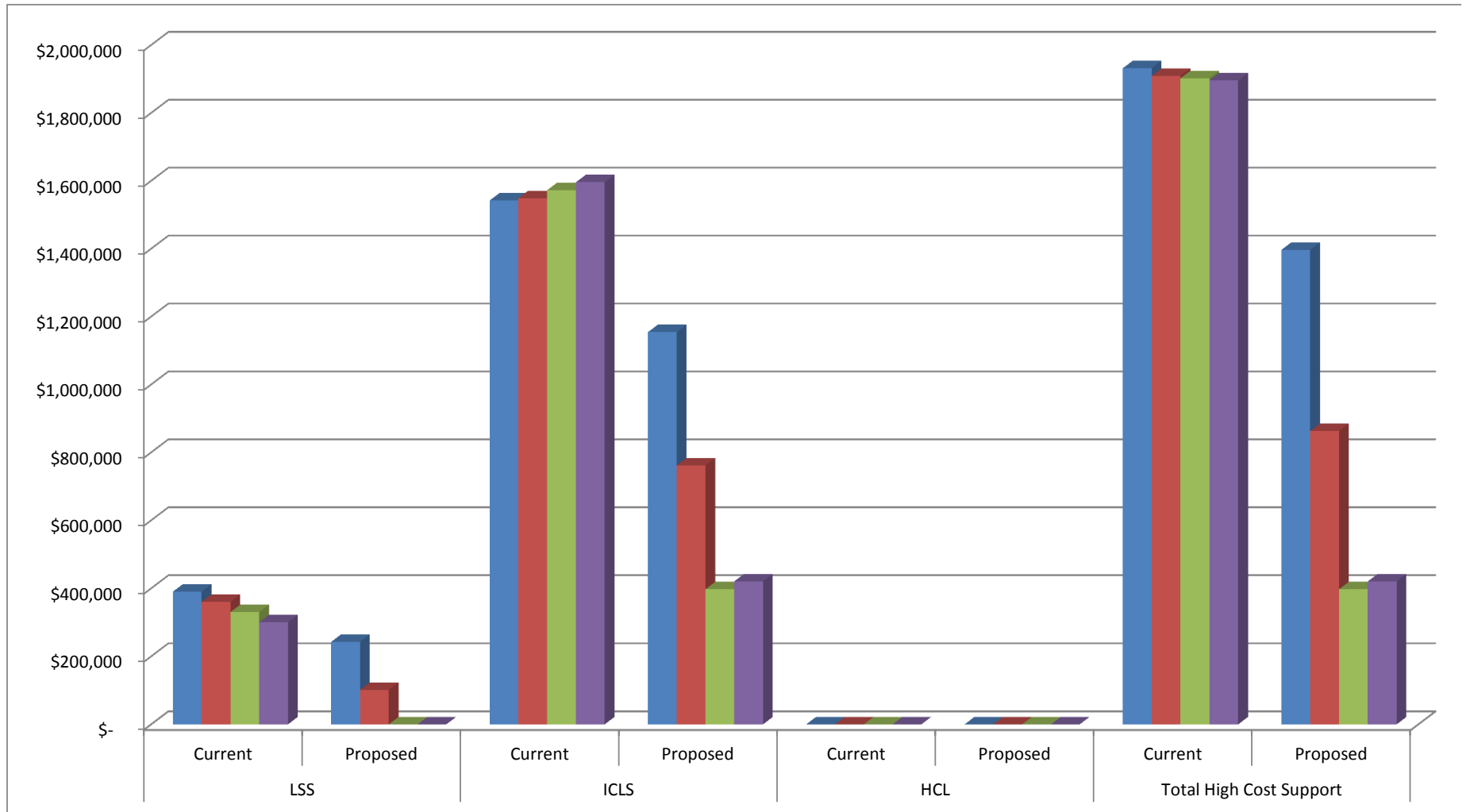
**Fidelity Telephone Company
Impact of Proposed FCC Changes
To Monthly High Cost Support Per Loop**



	2009	2010	2011	2012	2013	2014	2015
Existing Monthly Support Per Loop							
Proposed Monthly Support Per Loop							
Impact of Proposed Changes							
Cumulative Impact							

**CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET
NOS. 05-337, 07-135 AND 10-90 AND GN DOCKET NO. 09-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

**Fidelity Telephone Company
Impact of Proposed FCC Changes
To High Cost Support**



LSS		ICLS		HCL		Total High Cost Support		Difference	Per Line Per Month
Current	Proposed	Current	Proposed	Current	Proposed	Current	Proposed		

Fidelity Telephone Company
Study Area 421882

CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTICE ORDER IN CC DOCKET NO. 01-92, WC DOCKETS NOS. 05-337, 07-135 AND 10-90 AND GN DOCKET NO 09-51 BEFORE THE FCC

Line	Calc	Description	USAC / Cost Studies		NECA Forecast		Projections		
			2009	2010	2011	2012	2013	2014	2015

Existing Universal Service Support

1	USAC or RMS	Local Switching Support (LSS)
2	USAC or RMS	Interstate Common Line Support (ICLS)
3	USAC or RMS	High Cost Loop Support (2 year lag)
4	USAC or RMS	Safety-net Additive
5	Sum 1 to 4	Annual Support
6	HCL Ln 070	Category 1.3 Loops
7	Ln 5 / Ln 6	Existing Annual Support per Loop
7a	Ln 7 / 12	Existing Monthly Support per Loop

Revised Support based on FCC Proposals

8	Input and Calc Ln 40	LSS - Corp Op Phase-out
9	Input and Calc Ln 41	LSS - Corp Op and Total Phase-out
10	Input and Calc Ln 44	ICLS - Corp Op Phase-out
11	Input and Calc Ln 56	HCL - Revised %s
12	Input and Calc Ln 56	HCL - Corp Op Phase-out
13	Input and Calc Ln 56	HCL - Corp Ops + Reduced %s
14	Estimated Impact Ln 30	Safety-net Additive
15	Lns 9 + 10 + 13 + 14	Proposed Annual Support
16	Ln 15 / Ln 6 / 12	Proposed Monthly Support Per Loop

Impact of Support Changes

17	Ln 8 - Ln 1	LSS - Corp Op Phase-out
18	Ln 9 - Ln 8	LSS - Corp Op and Total Phase-out
19	Ln 10 - Ln 2	ICLS - Corp Op Phase-out
20	Ln 11 - Ln 3	HCL - Revised %s
21	Ln 12 - Ln 3	HCL - Corp Op Phase-out
22	Ln 13 - Ln 3	HCL - Corp Ops + Reduced %s
23	Ln 14 - Ln 4	Safety-net Additive
24	Lns 18 + 19 + 22 + 23	Annual Support Reduction

Impact Per USF Loop

25	Ln 17 / Ln 6	LSS - Corp Op Phase-out
26	Ln 18 / Ln 6	LSS - Corp Op and Total Phase-out
27	Ln 19 / Ln 6	ICLS - Corp Op Phase-out
28	Ln 20 / Ln 6	HCL - Revised %s
29	Ln 21 / Ln 6	HCL - Corp Op Phase-out
30	Ln 22 / Ln 6	HCL - Corp Ops + Reduced %s
31	Ln 23 / Ln 6	Safety-net Additive
32	Ln 24 / Ln 6	Annual Support Reduction Per Loop (Recovery Unknown)
33	Ln 32 / 12	Monthly Support Reduction per Loop (Recovery Unknown)

34	Accum Ln 33	Cumulative Impact Per Loop Per Month
----	-------------	---

Comparison of Current Local Rates to Proposed Benchmark

35	Estimated Impact Ln 44	Current Average Local Rate without Additional Charges
36	NPRM	Proposed National Benchmark w/o Additional Charges
37	Ln 36 - Ln 35	Difference - Amount to Reach Proposed National Benchmark

Fidelity Telephone Company

Study Area 421882

CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTICE ORDER IN CC DOCKET NO. 01-92, WC DOCKETS NOS. 05-337, 07-135 AND 10-90 AND GN DOCKET NO 09-51 BEFORE THE FCC

Estimated Impact

Line	Calc	Description	USAC / Cost Studies		NECA Forecast		Projections		
			2009	2010	2011	2012	2013	2014	2015
<u>Existing Universal Service Support</u>									
1	USAC or RMS	Local Switching Support (LSS)							
2	USAC or RMS	Interstate Common Line Support (ICLS)							
3	USAC or RMS	High Cost Loop Support (2 year lag)							
4	USAC or RMS	Safety-net Additive							
5	Sum 1 to 4	Annual Support							
6	HCL Ln 070	Category 1.3 Loops							
7	Ln 5 / Ln 6	Existing Annual Support per Loop							
<u>Other Interstate Revenues</u>									
8	Input Ln 18	SLC Revenues (Estimated on Access Loops)							
9	Input Ln 13	FUSC Revenues as USF Contributions							
10	Part 69, A-1 Ln 23	Traffic Sensitive Revenue Requirement							
11	Ln 1, above	Local Switching Support (LSS)							
12	Part 69, A-1 Ln 23	Special Access Revenue Requirement							
13	Part 69, A-1 Ln 23	DSL Revenue Requirement							
14	Sum 8 to 13	Total additional Interstate Revenues							
<u>Revised High-Cost Loop for 55% and 65% Changes in Calculation</u>									
15	Ln 34, Input	1st Revision - High Cost Loop Support (2 year lag)							
<u>Revised Universal Support due to Corporate Operations Changes</u>									
16	Ln 40, Input	Local Switching Support (LSS)							
17	Ln 44, Input	Interstate Common Line Support (ICLS)							
18	Ln 56, Input	High Cost Loop Support (2 year lag)							
19	Ln 4 * Phase down %	Safety-net Additive							
20	Ln 16 to 19	Annual Support with Corporate Operations Impact							
<u>Revised Universal Support due to Corporate Operations Changes and Phase-down of Support</u>									
21	Ln 41, Input	Local Switching Support (LSS)							
22	Ln 45, Input	Interstate Common Line Support (ICLS)							
23	Ln 18	High Cost Loop Support (2 year lag)							
24	Ln 4 * Phase down %	Safety-net Additive							
25	Ln 21 to 24	Annual Support w Corp Ops and Phase-down Impact							
26	Ln 24 / Ln 6	Revised Annual Support per Loop							
<u>Summary of Estimated Impact by USF Support Mechanism</u>									
27	Ln 21 - Ln 1	Local Switching Support (LSS)							
28	Ln 22 - Ln 2	Interstate Common Line Support (ICLS)							
29	Ln 23 - Ln 3	High Cost Loop Support (2 year lag)							
30	Ln 24 - Ln 4	Safety-net Additive							
31	Ln 27 to Ln 30	Total Difference in USF Support							
<u>Impact of USF Changes per Loop</u>									
32	Ln 27 / Ln 6	Local Switching Support (LSS)							
33	Ln 28 / Ln 6	Interstate Common Line Support (ICLS)							
34	Ln 29 / Ln 6	High Cost Loop Support (reflects 2 year lag)							
35	Ln 30 / Ln 6	Safety-net Additive							
36	Ln 32 to Ln 35	Annual Support Reduction Per Loop (Recovery Unknown)							
37	Ln 36 / 12	Monthly Support Reduction per Loop (Recovery Unknown)							
38	NPRM ¶460	National Average Rate excluding additional charges (\$25.62 with additional charges)							
39	Tariff	Existing Rates - residence							
40	Tariff	Existing Rates - business							
41	From DR	Residential Lines							
42	From DR	Single Line Business Lines							
42	From DR	Multi-Line Business Lines							
43	Lines times rates	Local revenue (w/o lifeline)							
44	Rev / by total lines	Average revenue per line							
45	Difference	Amount to reach national average rate							

Fidelity Telephone Company
Study Area 421882

CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKETS NOS. 05-337, 07-135 AND 10-90 AND GN DOCKET NO 09-51 BEFORE THE FCC
Input Information and Calculation

Line	Source	Description	USAC/Cost Studies		NECA Forecast		Projections		
			2009	2010	2011	2012	2013	2014	2015
1	HCL Ln 070	Category 1.3 Loops							
		<u>Corporate Operations Expense Included in Support</u>							
2	L410 + 420, Col 2	LSS							
3	P69, A8, L11 + 12	ICLS							
4	USF LCA, P2, L19	HCL (2 year lag)							
5	USF Corp Ops Ln U	Corporate Operations							
6	USF Corp Ops Ln V	Corporate Operations - Disallowed in HCL							
		<u>Information from RMS - LSS</u>							
7	LSS Page 2	Expenses and Other Taxes							
8	LSS Page 2	Return on Investment							
9	LSS Page 2	Federal Income Tax Requirement							
10	(Ln 7 + 8 + 9)	Local Switching Revenue Requirement							
11	LSS Page 2	Local Switching Support							
		<u>Information from RMS - ICLS:</u>							
12	Part 69, A-1 Ln 23	CCL Revenue Requirement							
13	Part 69, A-8 Ln 8b	FUSC Revenues as USF Contributions							
14	CSS Tab 80.1	Residential/SLB Loops							
15	CSS Tab 80.1	MLB Loops							
16	NECA Tariff	Subscriber Line Charge (SLC) per month - Residential							
17	NECA Tariff	Subscriber Line Charge (SLC) per month - Business							
18	(Ln 14*16+(15*17))	Estimated Annual SLC Revenue							
		<u>Information from RMS - HCL:</u>							
19	USF, LCA, P3, L27	NACPL							
20	USF, LCA, P2, L26	SACPL - Initial							
21	USF, LCA, P2, L25	Total Unseparated Costs							
22	HCL P 1, L 060	Total Loops							
		<u>Calculate HCL</u>							
23	Ln 19 * 1.15	NACPL * 1.15							
24	Ln 19 * 1.50	NACPL * 1.50							
25	IF 20 > 23, 0, 20 - 23	SACPL that Exceeds 115% but less than 150%							
26	IF 20 > 24, 0, 20 - 24	SACPL that Exceeds 150%							
27	(Ln 25 - 26) * (.65)	USF Support @ 65%							
28	(Ln 26 * .75)	USF Support @ 75%							
29	(Ln 27 + 28)	Support per Line Allowed							
30	(Ln 29 * 1)	Calculated HCL Support - Initial							
		<u>HCL Change in 2011</u>							
31	(Ln 25 - 26) * (.55)	USF Support @ 55%							
32	(Ln 26 * .65)	USF Support @ 65%							
33	(Ln 31 + 32)	Revised Support per Line Allowed							
34	(Ln 33 * 1)	Calculated HCL Support - 1st Revision 2-year Lag							
		<u>Phase-down of Corp Ops Included in Support</u>							
35	(Ln 2 * phase down %)	Local Switching Support (LSS)							
36	(Ln 3 * phase down %)	Interstate Common Line Support (ICLS)							
37	(Ln 4 * phase down %)	High Cost Loop Support							
		<u>LSS Revision for Corporate Operations; \$0.00 by 2014</u>							
38	(Ln 7 - 2 + 35)	Revised Expenses for Corporate Operations							
39	(Ln 8 + 9 + 38)	Revised Local Switching Revenue Requirement							
40	(Ln 11 / 10 * 39)	Revised LSS (Corporate Operations Impact)							
41	(Ln 40 * phase down)	Phase-out of LSS							
41a	Corp Ops, only								
41b	Phase down								
		<u>ICLS Revision for Corporate Operations; \$0.00 by 2014</u>							
42	(Ln 12 - 3 + 36)	Revised CCL Revenue Requirement (Corp Ops)							
43	(Ln 13 + 18)	Less FUSC (as USAC Cont) and SLC Revenues							
44	(Ln 42 + 43)	Estimated ICLS (Corporate Operations Impact)							
45	(Ln 44 * phase down)	ICLS does not phase-down; converts to CAF long term							
		<u>HCL Revision for Corporate Operations; \$0.00 by 2014</u>							
46	(Ln 21 - 4 + 37)	HCL Revised Unseparated Costs for Corporate Operations							
47	(Ln 46 / 22)	Revised SACPL for Corporate Operations							
48	Ln 19 Adjusted	Estimated NACPL (Impact of Corp Ops)							
49	Ln 48 * 1.15	NACPL * 1.15							
50	Ln 48 * 1.50	NACPL * 1.50							
51	IF 47 > 49, 0, 47 - 49	SACPL that Exceeds 115% but less than 150%							
52	IF 47 > 50, 0, 47 - 50	SACPL that Exceeds 150%							
53	(Ln 51 - 52) * (.55)	USF Support @ 55%							
54	(Ln 52 * .65)	USF Support @ 65%							
55	Ln 53 + 54	Revised Support per Line Allowed							
56	Ln 55 * Ln 1	Revised HCL for Corp Ops Impact 2-year lag							
57	HCL - FY1	Safety-net additive							